

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAARILLE LINZY,

Plaintiff,

- against -

UBER TECHNOLOGIES, INC.

Defendant.

: Civil Action No.: 1:21-cv-
: 05097

: **ALTERNATE PROPOSED**
: **VERDICT SHEET –PHASE**
: **ONE**

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Defendant UBER TECHNOLOGIES, INC. (hereinafter “Uber”), by its attorney, Coughlin Betke LLP, respectfully requests that the following verdict sheet be given to the jury for deliberating the Phase One of the trial of this action:

INSTRUCTIONS:

ALL JURORS MUST AGREE ON THE ANSWER TO EACH QUESTION.

MAKE NO MARKS ON BLANK SPACES. MARK ANSWERS TO QUESTIONS ONLY ON THE LINES PROVIDED.

QUESTIONS BEGIN ON THE FOLLOWING PAGE.

1. Did Plaintiff SHAARILLE LINZY prove by a preponderance of the evidence that Jose Alemar was online in the driver version of the Uber App, and available to receive ride requests on the Uber platform, at the time of the incident?

Yes _____ No _____

All jurors must agree on the answer to this question.

If your answer to Question #1 is Yes, please proceed to answer Question #2. If your answer to Question #1 is No, please proceed no further and let the Court know you are done deliberating. Do not answer any additional questions.

2. Did Plaintiff SHAARILLE LINZY prove by a preponderance of the evidence that JOSE ALEMAR was an employee of UBER TECHNOLOGIES, INC. at the time of the incident?

Yes _____ No _____

All jurors must agree on the answer to this question.

If your answer to Question #2 is Yes, please proceed to answer Question #3. If your answer to Question #2 is No, please proceed no further and let the Court know you are done deliberating. Do not answer any additional questions.

3. Did the Plaintiff SHAARILLE LINZY prove by a preponderance of the evidence that JOSE ALEMAR was negligent?

Yes _____ No _____

All jurors must agree on the answer to this question.

If your answer to Question #3 is Yes, please proceed to answer Question #4. If your answer to Question #3 is No, please proceed no further and let the Court know you are done deliberating. Do not answer any additional questions.

4. Did the Plaintiff SHAARILLE LINZY prove by a preponderance of the evidence that JOSE ALEMAR's negligence was a substantial factor in causing the incident?

Yes _____ No _____

All jurors must agree on the answer to this question.

If your answer to Question #4 is Yes, please proceed to answer Question #5. If your answer to Question #4 is No, please proceed no further and let the Court know you are done deliberating. Do not answer any additional questions.

5. Did UBER TECHNOLOGIES, INC. prove by a preponderance of the evidence that Plaintiff SHAARILLE LINZY was negligent?

Yes _____ No _____

All jurors must agree on the answer to this question.

If your answer to Question #5 is Yes, please proceed to answer Question #6. If your answer to Question #5 is No, please proceed to Question #7.

6. Did UBER TECHNOLOGES, INC. prove by a preponderance of the evidence that Plaintiff SHAARILLE LINZY's negligence was a substantial factor in causing the incident?

Yes _____ No _____

All jurors must agree on the answer to this question.

Please proceed to answer Question #7.

7. Please state the percentages of fault for each party listed below. The total of these percentages must equal 100%:

JOSE ALEMAR _____ %

Plaintiff SHAARILLE LINZY _____ %

All jurors must agree on the answer to this question.

UBER TECHNOLOGIES, INC. reserves the right to amend or supplement this proposed verdict sheet depending on the proof adduced at trial.